

MR. NETTLETON: Good afternoon, and thank you. Jerry Nettleton, with Twenty Mile Coal. In addition to my comments, I have a sheaf of letters from coal miners and their families, who couldn't be here because they're earning a living, expressing their concerns and comments. As a general comment, the BLM, two years ago, developed new protocols, policy guidance, a manual and handbook to implement GAO and OIG recommendations from their coal program review. It was a very recent and significant effort. There's a reasonable basis to question the need and motivation for both the PEIS and the leasing moratorium; more specifically, addressing the stated reasons for the proposed PEIS and moratorium. Fair return. In evaluating fair return, any discussion or analysis, you must consider all components of return and economic benefits from leasing and production of the resource, including bonus bid payments, rents, royalties, State and local property taxes, sales taxes, employment taxes, employee benefits, and low-cost reliable power from coal for businesses and utility rate payers. Market conditions. Decreases in coal production, extensive layoffs, coal company bankruptcies, and social impacts on affected communities and regions are very real and immediate impacts of the current policies and some of the proposed actions. These need to be considered, and deserve and should be considered in any objective analysis. Coal leasing and climate considerations. A rational energy policy should be based on a true all-of-the-above approach. This approach is essential if we are going to meet our projected future energy needs. The current focus seems to be on addressing climate considerations. But, this has to be balanced with the critical need to maintain reliable energy generation and distribution systems and provide affordable power for our households -- for our households and businesses. Following the recommendations for consideration and analysis in the coal program review. Number 1, maintain a viable policing program consistent with Mineral Leasing Act and Amendments. It looks like I'm out of time. So, I will submit these are written comments. But, I would like to close. In conclusion, recognize and remember that any actions that reduce the viability and availability of reliable, affordable coal-based electricity will impact, not just coal miners and their communities, but every household and business that pays an electricity bill. The good Lord created coal and not to be left in the ground, but to be used

as a resource and to be used wisely. This is what we need to focus on.